

FILED

2018 APR 26 PM 2: 18

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

JUDGE LIOTI

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL TOWNSEND,

Defendant.

) INDICTMENT

) CASE NO.

1:18 CR 201

) Title 18, Sections 922(g)(1) and  
) 924(c)(1)(A)(i); Title 21,  
) Sections 841(a)(1) and (b)(1)(B),  
) United States Code

COUNT 1

(Felon in Possession of Firearm and Ammunition, in violation of 18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about March 2, 2018, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TOWNSEND, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Trafficking, on or about April 16, 2014, in Case Number CR-13-580515, in Cuyahoga County Common Pleas Court, Drug Possession, on or about May 27, 2009, in Case Number CR-09-520859, in Cuyahoga County Common Pleas Court, and Assault, on or about January 29, 2008, in Case Number CR-07-502789, in Cuyahoga County Common Pleas Court, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Century Arms, Model RAS47, semiautomatic rifle, bearing serial number RAS47082396, twenty-eight (28) rounds of 7.62 caliber ammunition, one (1) round of .40 caliber ammunition, forty-two (42) rounds of 9 mm caliber ammunition, and forty-five (45) rounds of .38 special caliber ammunition, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2

(Possession with Intent to Distribute Cocaine Base, in violation of 18 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

On or about March 2, 2018, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TOWNSEND, did knowingly and intentionally possess with intent to distribute approximately 31.94 grams of a mixture or substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 3

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

On or about March 2, 2018, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TOWNSEND, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, possess with intent to distribute a controlled substance, as charged in Count 2, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

(Felon in Possession of Firearm and Ammunition, in violation of 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about March 14, 2018, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TOWNSEND, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Trafficking, on or about April 16, 2014, in Case Number CR-13-580515, in Cuyahoga County Common Pleas Court, Drug Possession, on or about May 27, 2009, in Case Number CR-09-520859, in Cuyahoga County Common Pleas Court, and Assault, on or about January 29, 2008, in Case Number CR-07-

502789, in Cuyahoga County Common Pleas Court, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Smith & Wesson, M&P, 9 mm pistol, bearing serial number MPH6136, and eighteen (18) rounds of 9 mm caliber ammunition, all in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 4, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendant MICHAEL TOWNSEND, shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations.

A TRUE BILL.